

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$40,238.00 IN UNITED
STATES CURRENCY,

Defendant.

VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM

The United States of America, by its attorneys, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States Attorney for this district, alleges the following in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

Nature of the Action

1. This is a civil action to forfeit property to the United States of America, under 21 U.S.C. § 881(a)(6), for violations of 21 U.S.C. § 841(a)(1).

The Defendant In Rem

2. The defendant property, approximately \$40,238.00 in United States currency, was seized on or about March 20, 2019, from Bobby Watkins and Tasnique Love at or near 3XXX N. 41st Street, Milwaukee, Wisconsin.

3. The defendant property is presently in the custody of the United States Marshal Service in Milwaukee, Wisconsin.

Jurisdiction and Venue

4. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

5. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

6. Venue is proper in this district under 28 U.S.C. § 1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district.

Basis for Forfeiture

7. The defendant property, approximately \$40,238.00 in United States currency, is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6) because it was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

Facts

8. Heroin is a Schedule I controlled substance under 21 U.S.C. § 812.

9. Marijuana is a Schedule I controlled substance under 21 U.S.C. § 812.

10. Cocaine is a Schedule II controlled substance under 21 U.S.C. § 812.

11. Fentanyl is a Schedule II controlled substance under 21 U.S.C. § 812.

12. Lactose is used by drug dealers to cut or dilute controlled substances.

The Weupnexxt rap group and drug trafficking organization

13. From at least January 2018 through March 2019, the Weupnexxt rap group recorded and published YouTube videos. Five members of the rap group included Bobby Watkins and individuals having the initials D.W., L.W., S.N., and E.J.

14. From at least July 2018 through March 2019, Bobby Watkins, D.W., L.W., S.N., and E.J. were also involved in trafficking controlled substances. (Hereinafter these five individuals are collectively referred to as the “drug trafficking organization” or “DTO.”)

15. Bobby Watkins and D.W. were the leaders of the DTO.

16. From at least July 25, 2018, through March 8, 2019, members of the DTO conducted the following drug-trafficking transactions, among others:

- A. On July 25, 2018, an undercover officer (“UC”) purchased 2.47 grams of cocaine/fentanyl for \$150 from S.N.
- B. On August 30, 2018, the UC purchased 0.39 grams of heroin/fentanyl for \$80 from E.J. The deal was set up by a phone call from UC to Bobby Watkins.
- C. On September 5, 2018, the UC purchased 0.4 grams of heroin/fentanyl for \$80 from D.W., with Bobby Watkins and E.J. present. The deal was set up by a phone call from UC to Bobby Watkins.
- D. On September 11, 2018, the UC purchased 0.4 grams of heroin/fentanyl for \$80 from E.J.
- E. On September 19, 2018, the UC purchased 0.4 grams of heroin/fentanyl for \$80 from Bobby Watkins and D.W. The deal was set up by a phone call from UC to Bobby Watkins.
- F. On November 7, 2018, the UC purchased 0.57 grams of heroin/fentanyl for \$80 and 0.57 grams of cocaine/fentanyl for \$80 from D.W. and E.J.
- G. On November 12, 2018, the UC purchased 0.4 grams of heroin for \$80 from S.N.
- H. On December 4, 2018, the UC purchased 0.51 grams of heroin/fentanyl for \$80 from L.W.
- I. On January 7, 2019, the UC purchased 0.79 grams of heroin/fentanyl for \$160 from S.N.
- J. On February 4, 2019, the UC purchased 0.766 grams of heroin/fentanyl for \$160 from L.W.
- K. On March 8, 2019, the UC purchased 0.7 grams of heroin/fentanyl from Bobby Watkins. The UC paid \$80 to Watkins, but Watkins told the UC

that the UC still owed Watkins another \$20. The deal was set up by a phone call from UC to Bobby Watkins.

17. From January 2018 through March 2019, some of the YouTube videos that Weupnexxt recorded and published that reference their drug-trafficking activities include the following:

- A. “EastSide Cypher” WeUpNexxt | BMB PoohPooh | Goowap | Fro | Johnny Cash | Spanish Rice: The video depicts Bobby Watkins, E.J., S.N., and L.W. During the video, Bobby Watkins, E.J., and L.W. are all holding large amounts of cash. Bobby Watkins also references selling one ounce of powder cocaine for \$1,180.
- B. Lil Chicken & WeUpNexxt Fresh - Back 2 Back [Shot By TeeGlazedIt]: The video depicts Bobby Watkins, E.J., and S.N. holding large amounts of cash. E.J. talks about cooking crack cocaine, selling drugs, adding cutting agent to heroin, and having a firearm with a 100-round magazine.
- C. WeUpNexxt - Blow Tales [Prod. RichieWitDaHitz] Shot By @TeeGlazedIt: The video shows a large amount of cash on the floor. L.W. licks a rolling paper with an unknown substance inside, similar to rolling a marijuana joint and throws several handfuls of cash into the air. L.W. says that he paid \$1,500 for shoes and that he sold 50 grams. The chorus of the song was “all bust down hand to hand no wholesales” (which is believed to mean that the DTO sold small amounts of drugs, not large amounts). E.J. talks about cooking heroin. Bobby Watkins says that he has heroin and crack cocaine, and he has some things that you can shoot and snort (which are both methods of consuming heroin).
- D. WeUpNexxt Fresh| WeUpNexxt Great |3hirtyk - Boffum (Prod by RichieWitDaHitz) [Shot By DineroGangRay]: The video depicts Bobby Watkins and E.J. holding large amounts of cash. E.J. says he gave a free gram away.
- E. WeUpNexxt Fresh & WeUpNexxt Great - Lil Bit [Prod. Emazon] Shot By @TeeGlazedIt: The video depicts a large amount of cash on the floor. Bobby Watkins and E.J. are holding large amounts of cash. Bobby Watkins also has a large amount of cash tucked in his beltline. E.J. talks about hiding a brick (slang for a kilogram of drugs) in a female’s house and cooking crack cocaine. Bobby Watkins says that everything he owns comes from cooking crack.
- F. Weupnexxt | Big Ken - Thot Hoes [Shot By DineroGangRay]: The video depicts Bobby Watkins, E.J., D.W., and L.W. holding large amounts of cash. Bobby Watkins also has a large amount of cash tucked into his beltline.

- G. WeUpNexxt Fresh | TID Sweezee Don - Double Back [Shot By DineroGangRay]: The video depicts E.J. talking about cooking crack cocaine and saying “so many grams in this house, should have a nurse in it.”
- H. WeUpNexxt – Joggin’ Through The Bag [Shot By @TeeGlazedIt]: The video depicts Bobby Watkins holding a large amount of cash and six flip phones, L.W. holding a large amount of cash and several flip phones, E.J. holding a large amount of cash and a pistol with an extended magazine and pointing it at the camera, D.W. with a large amount of cash in his pants pockets, and S.N. holding a large amount of cash.

18. Bobby Watkins supplied controlled substances to the DTO for sales and distribution.

19. As the drug supplier for the DTO, Bobby Watkins often possessed a large amount of currency that was intended to be used in exchange for controlled substances, was proceeds of trafficking in controlled substances, or both.

March 19, 2019 traffic stop and arrest of Bobby Watkins, D.W., and E.J.

20. On or about March 19, 2019, Milwaukee Police Department officers attempted to conduct a traffic stop on a Hyundai sedan near North 7th Street and West Keefe Avenue in Milwaukee, Wisconsin.

21. After officers activated their emergency lights in an attempt to stop the Hyundai, the driver of the Hyundai accelerated and sped away.

22. The driver of the Hyundai ultimately lost control and struck a light pole and two trees. The vehicle came to rest on a fence in the area of 3960 N. Richards Street in Milwaukee, Wisconsin.

23. After the Hyundai crashed, all three occupants of the vehicle fled on foot.

24. Officers caught up to and arrested the three occupants, who were identified as Bobby Watkins, D.W., and E.J.

25. On Bobby Watkins’ person was 14.86 grams of marijuana.

26. Inside the Hyundai were the following:
- A. One baggie containing 14.26 grams of marijuana,
 - B. One baggie containing 15.73 grams of cocaine,
 - C. One baggie containing 7.58 grams of heroin,
 - D. 20 corner cut baggies containing 7.22 grams of heroin, and
 - E. One semi-automatic firearm.

March 20, 2019 execution of search warrant at Bobby Watkins and Tasnique Love's residence

27. The next day, on March 20, 2019, officers executed a search warrant at the residence of Bobby Watkins and Tasnique Love located at 3XXX North 41st Street, Milwaukee, Wisconsin ("Watkins' residence").

28. During the execution of the search warrant on March 20, 2019, officers seized the following items, among other things, from the master bedroom of Watkins' residence:

- A. Approximately \$22,306 in United States currency inside a Gucci handbag in a drawer beneath the bed.
- B. Approximately \$17,270 in United States currency inside a shoe box in a closet containing men's clothing – including a jacket and pants that Bobby Watkins was wearing in several rap videos posted on social media, including some videos showing Watkins holding large amounts of cash and having large amounts of cash protruding from his waist band and pants pockets.

29. During the execution of the search warrant on March 20, 2019, officers seized approximately \$512 in United States currency from a built-in hutch in the dining room of Watkins' residence.

30. On March 20, 2019, officers seized a total of approximately \$40,238.00 in United States currency from Watkins' residence.

March 20, 2019 execution of search warrant at D.W.'s residence

31. On March 20, 2019, officers executed a search warrant at the residence of D.W. and D.W.'s girlfriend, A.V., located at 9XXX West Capitol Drive, Apartment #X, Milwaukee, Wisconsin ("D.W.'s residence").

32. During the execution of the search warrant on March 20, 2019, officers seized the following items, among other things, from D.W.'s residence:

- A. A total of approximately 89.65 grams of a cocaine and fentanyl mixture,
- B. A total of approximately 10.56 grams of high-grade marijuana,
- C. A total of approximately 10.87 grams of marijuana, and
- D. A Sturm Ruger 556 semi-automatic rifle, which was reported as stolen from South Milwaukee, Wisconsin, on or about November 15, 2018.

Bobby Watkins' State Charges

33. On March 26, 2019, Bobby Watkins was charged in Milwaukee County Circuit Court, Case No. 19CF1289, with (1) manufacture/deliver heroin – conspiracy to commit, and (2) manufacture/deliver cocaine – conspiracy to commit.

State Charges Against Other Four DTO Members

34. On March 26, 2019, D.W. was charged in Milwaukee County Circuit Court, Case No. 19CF1291, with (1) manufacture/deliver heroin – conspiracy to commit, (2) manufacture/deliver cocaine – conspiracy to commit, and (3) possession of a firearm by a convicted felon.

35. On March 26, 2019, E.J. was charged in Milwaukee County Circuit Court, Case No. 19CF1285, with (1) manufacture/deliver heroin – conspiracy to commit, and (2) manufacture/deliver cocaine – conspiracy to commit.

36. On March 26, 2019, S.N. was charged in Milwaukee County Circuit Court, Case No. 19CF1287, with (1) manufacture/deliver heroin – conspiracy to commit, and (2) manufacture/deliver cocaine – conspiracy to commit.

37. On March 26, 2019, L.W. was charged in Milwaukee County Circuit Court, Case No. 19CF1288, with (1) manufacture/deliver heroin – conspiracy to commit, and (2) manufacture/deliver cocaine – conspiracy to commit.

Administrative Forfeiture Proceedings

38. On or about April 30, 2019, the Drug Enforcement Administration (“DEA”) began administrative forfeiture proceedings against the approximately \$40,238.00 in United States currency seized from Bobby Watkins’ residence on March 20, 2019, on the ground that the seized currency was used or intended to be used in exchange for controlled substances or was proceeds of trafficking in controlled substances.

39. On or about July 15, 2019, Tasnique Love filed a claim and a petition for remission with the DEA in the administrative forfeiture proceedings to the defendant approximately \$40,238.00 in United States currency.

Warrant for Arrest In Rem

40. Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the defendant property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

Claims for Relief

41. The plaintiff alleges and incorporates by reference the paragraphs above.

42. By the foregoing and other acts, the defendant property, approximately \$40,238.00 in United States currency, was used or intended to be used in exchange for controlled

substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

43. The defendant approximately \$40,238.00 in United States currency is therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant property, approximately \$40,238.00 in United States currency, be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the defendant property to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 2nd day of October, 2019.

Respectfully submitted,

MATTHEW D. KRUEGER
United States Attorney

By: s/SCOTT J. CAMPBELL
SCOTT J. CAMPBELL
Assistant United States Attorney
Scott J. Campbell Bar Number: 1017721
Attorney for Plaintiff
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517 East Wisconsin Avenue, Room 530
Milwaukee, Wisconsin 53202
Telephone: (414) 297-1700
Fax: (414) 297-1738
E-Mail: scott.campbell@usdoj.gov

Verification

I, Logan Staege, hereby verify and declare under penalty of perjury that I am a Police Officer with the South Milwaukee Police Department and an Investigator currently assigned to the Milwaukee Metropolitan Drug Enforcement Group (MMDEG), that I have read the foregoing Verified Complaint for Civil Forfeiture *in rem* and know the contents thereof, and that the factual matters contained in paragraphs 8 through 32 of the Verified Complaint are true to my own knowledge.

The sources of my knowledge and information are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as an Investigator with the MMDEG.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Date: 10/2/19

s/LOGAN STAEGE
Logan Staege

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

Place an "X" in the appropriate box: ☐ Green Bay Division ☒ Milwaukee Division

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Scott J. Campbell, AUSA
US Attorney's Office, #530 Federal Building
517 E. Wisconsin Avenue, Milwaukee, WI 53202 (414-297-1700)

DEFENDANTS

APPROXIMATELY \$40,238.00 IN UNITED STATES CURRENCY

County of Residence of First Listed Defendant Milwaukee

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
		IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIW W (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
			FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
21 USC § 881(a)(6)

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

10/02/2019

s/SCOTT J. CAMPBELL

FOR OFFICE USE ONLY

RECEIPT #

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$40,238.00 IN UNITED
STATES CURRENCY,

Defendant.

WARRANT FOR ARREST IN REM

To: THE UNITED STATES MARSHAL
Eastern District of Wisconsin

WHEREAS, a Verified Complaint for Civil Forfeiture *in rem* was filed on the 2nd day of October, 2019, by the United States Attorney for the Eastern District of Wisconsin, which seeks the forfeiture of the above-named defendant property pursuant to Title 21, United States Code, Section 881(a)(6), and which prays that process issue to enforce the forfeiture and to give notice to all interested parties to appear before the court and show cause why the forfeiture should not be decreed; and due proceedings being had, that the defendant property be condemned and forfeited to the use of the United States of America.

YOU ARE THEREFORE HEREBY COMMANDED to attach and arrest the defendant property, approximately \$40,238.00 in United States currency, which was seized on or about March 20, 2019, from Bobby Watkins and Tasnique Love at or near 3XXX N. 41st Street, Milwaukee, Wisconsin, and which is presently in the custody of the United States Marshal

Service in Milwaukee, Wisconsin, in the Eastern District of Wisconsin, and to detain the same until further order of this Court.

Dated this ____ day of _____, 2019, at Milwaukee, Wisconsin.

STEPHEN C. DRIES
Clerk of Court

By:

Deputy Clerk

Return

This warrant was received and executed with the arrest of the above-named defendant.

Date warrant received: _____

Date warrant executed: _____

Name and title of arresting officer: _____

Signature of arresting officer: _____

Date: _____